

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,  
individually and on behalf of a class of all others  
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**DECLARATION OF PHILIP IRWIN IN SUPPORT OF MOTION FOR LEAVE  
TO TAKE ADDITIONAL DEPOSITIONS**

I, PHILIP IRWIN, declare as follows:

1. I am an attorney and partner at the law firm Covington & Burling LLP, which is counsel to the Plaintiffs Black Love Resists in the Rust (“BLRR”), Shaketa Redden, Dorethea Franklin, Taniqua Simmons, De’Jon Hall, Joseph Bonds, Charles Palmer, Shirley Sarmiento, Ebony Yeldon, and Jane Doe in this matter.
2. I submit this Declaration in support of Plaintiffs’ Memorandum of Law in Support of the Motion for Leave to Take Additional Depositions.
3. I have served as counsel to plaintiffs in *Floyd v. City of New York*, No. 08 Civ. 1034 (S.D.N.Y.), a case which raised constitutional claims under the Fourth and Fourteenth Amendments against the City of New York and other defendants relating to New York’s stop-and-frisk policies and practices.
4. Based on a tabulation of deposition transcripts in our files, Plaintiffs deposed 76 witnesses in the *Floyd* litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 14, 2022 in New York, New York.

/s/ Philip Irwin

Philip Irwin  
COVINGTON & BURLING LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Tel: 212-841-1000  
Fax: 212-841-1010  
pirwin@cov.com

*Counsel for Plaintiffs*